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In the Matter of)
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DECT Forum Petition to Modify the) RM 11485
Service Rules for the UPCS Band)
1920-1930 MHz	j
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Comments Supporting

the
Petition for Rulemaking

Modifying Certain Rules in FCC Part 15

Governing the UPCS Band

During the development of the new platform DECT 6.0 for the US market, the potential for the interference from the 1915-1920 MHz portion of the H Block to the UPCS frequency band, 1920-1930 MHz has been questioned by several customers recently. With the study to the proposal made by DECT Forum, the proposed modification to the rules improve the utility of the band and prepare it for wider bandwidth, higher data payload devices which will be introduced in the near future.

The longer this petition is delayed the more devices will be in the field that cannot be protected from out of band emissions from the H Block, when those devices start to come into use. To avoid the future market complain due to the interference, most of the customers are expecting to see the solution for improving the problem in the soonest future!





I. The major points

According to the measurement, we do agreed with the points of the analysis provided in the DECT Forum filing, the potential for interference caused by the "Harmful interference" is significant; it may results a significant impact to the victim equipment, and cause consumer complain in the field application.

II. Summary

We hereby would like to reply as the comment to support the proposal for the DECT Forum's Petition for Rulemaking (FCC RM 11485) submitted on August 15, 2008.

Respectfully submitted,

Baycom Opto-Elec., Co., Ltd.

Oct., 05, 2008 for Baycom

Jack Lin

Vice President, Wireless Communication Div.